

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

SONRAI MEMORY LIMITED,

Plaintiff,

v.

ORACLE CORPORATION,

Defendant.

Case No. 6:21-CV-00116-ADA

JOINT CLAIM CONSTRUCTION STATEMENT

Pursuant to the Scheduling Order in this case (Dkt. No. 21) and the Court’s Updated Order Governing Proceedings—Patent Case (“Updated OGP”),¹ Plaintiff Sonrai Memory Limited (“Sonrai”) and Defendant Oracle Corporation (“Oracle”) file this Joint Claim Construction Statement.

I. AGREED CONSTRUCTIONS

For U.S. Patent 6,829,691 (“the ’691 patent”), the sole patent-in-suit, the parties agree that “memory controller” should be construed as “a circuit that issues the electrical control and physical address signals to a memory that cause the memory to read or write data.” The parties also agree that the phrase “claim 21” as it appears in claim 29 should be construed as “claim 28.”

¹ OGP Version 3.5.1, available at <https://www.txwd.uscourts.gov/wp-content/uploads/Standing%20Orders/Waco/Albright/Standing%20Order%20Governing%20Proceedings%20in%20Patent%20Cases%2011721.pdf>.

II. DISPUTED TERMS FOR CONSTRUCTION

Exhibit A sets forth the parties' respective proposed constructions for each of the disputed claim terms and phrases of the '691 patent.

Dated: December 6, 2021

Respectfully submitted,

/s/ Amy E. Hayden

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EXHIBIT A

#	'691 Patent Claim Term or Phrase for Construction	Plaintiff Sonrai's Proposed Construction	Defendant Oracle's Proposed Construction	Party or Parties Proposing Term for Construction
1	"compression/decompression logic" (claims 1 and 21 of the '691 patent)	"logic that can compress or decompress data"	"logic that can compress and decompress data"	Oracle
2	"logic for" (claim 1 of the '691 patent)	Plain and ordinary meaning; not means-plus function Alternatively, if means-plus-function: <u>Function</u> : "directing transfer of data from said first memory array via said first bus to be processed by said compression/decompression logic and then transferred to said second memory array via said second bus" <u>Structure</u> : memory controller or other logic (e.g., an operating system)	Means-plus-function under 35 U.S.C. § 112 ¶ 6 (pre-AIA) <u>Function</u> : "directing transfer of data from said first memory array via said first bus to be processed by said compression/decompression logic and then transferred to said second memory array via said second bus" <u>Structure</u> : indefinite	Oracle
3	"selection logic for" (claim 21 of the '691 patent)	Plain and ordinary meaning; not means-plus function Alternatively, if means-plus-function:	Means-plus-function under 35 U.S.C. § 112 ¶ 6 (pre-AIA) <u>Function</u> : "selecting and coupling a first of said busses to said	Oracle

#	'691 Patent Claim Term or Phrase for Construction	Plaintiff Sonrai's Proposed Construction	Defendant Oracle's Proposed Construction	Party or Parties Proposing Term for Construction
		<p><u>Function</u>: “selecting and coupling a first of said busses to said compression/decompression input” and “selecting and coupling a second of said busses to said compression/decompression output”</p> <p><u>Structure</u>: memory controller or other logic (e.g., an operating system)</p>	<p>compression/decompression input” and “selecting and coupling a second of said busses to said compression/decompression output”</p> <p><u>Structure</u>: indefinite</p>	

CERTIFICATE OF SERVICE

The undersigned certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system on December 6, 2021.

/s/ Amy E. Hayden
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